

Radically Open Security Privacy Policy

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Privacy Policy of Radically Open Security

Radically Open Security (ROS) consists of a bunch of idealistic security researchers who take privacy very seriously. ROS shall limit the processing of personal data to the absolute minimum, namely that what ROS needs to carry out its services, as explained below.

If you are a customer of ROS or a visitor of the website at www.radicallyopensecurity.com this policy applies to you.

Definition of personal data

Personal data is any information relating to any identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular (but not limited to) by reference to an identifier such as a name, an identification number, location information, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This may include for instance: your name, e-mail address, phone number, and login credentials.

When and how ROS collects personal data

Website and Cookies: The website of Radically Open Security at www.radicallyopensecurity.com does **not** use cookies. This website does not collect any personal data nor does ROS track, analyze, document, etc. how you browse or use the website.

Using ROS services

When you are interested in ROS services and you interact with ROS personal data is shared. Sometimes you provide ROS with personal data, sometimes personal data about you is requested.

Personal data can be collected and used for the following processes:

- When you submit ROS information by email or through a form on the ROS website;
- When you send ROS a request to start an intake;
- When ROS contacts you and discuss the scope of a potential assignment;
- When ROS prepares a proposal for an assignment;
- When ROS prepares and carries out an assignment;

- When ROS contacts you with relevant messages such as updates on assignments, questions pertaining to assignments or when requesting a response in RocketChat.

Types of personal data ROS collects to provide ROS services

Contact details your name, telephone number and e-mail address.

Information that identifies you, your log-in credentials if ROS creates accounts for ROS' internal secure chat environment to discuss the (scope of) assignments, function at your organization.

ROS personal data processing principles

ROS respects the right to the protection of personal data, interests and freedoms of you and shall observe the following principles when processing personal data:

- ***Lawful, Fair and Transparent Processing***: personal data shall be processed in accordance with applicable law, in a fair and transparent manner in relation to data subjects. The legal grounds for processing personal data of data subjects subject to the GDPR are explained below;
- ***Proportionality***: personal data shall be processed proportionate to the purposes for the processing taking into account ROS' legitimate interests, as well as your legitimate interests and those of any third party involved;
- ***Purpose Limitation***: personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with these purposes;
- ***Personal Data Relevance***: personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which the personal data are processed;
- ***Accuracy***: personal data shall be accurate and, where necessary, kept up to date. Every reasonable step shall be taken to assure that personal data that are inaccurate, having regard for the purpose for which the personal data is processed, are erased or rectified without delay;
- ***Storage Limitation***: personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- ***Integrity, Security and Confidentiality***: personal data shall be processed in a manner that ensures the appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, damage or disclosure by using appropriate technical, physical or organizational measures.

Why ROS collects personal data

To perform services, ROS only collects personal data necessary to perform the services you are interested in or requested. ROS needs your contact details to: To respond to and track your requests

- To deliver and discuss proposals, reports and other services you requested;
- To create and identify you as a user when introduced to internal systems;
- To identify you as a user in the ROS internal system;
- To process payments;
- To contact you from time to time to solicit feedback or request updates on your requests;

When processing personal data, ROS shall rely on the following legal grounds:

- Consent by you;
- Performance of a (past or future) contract with you;
- Compliance with legal obligations, in particular (but not limited to) in the area of data protection law, tax law, and corporate compliance laws;
- Protection of the vital interests of you or of another individual;
- Legitimate interest of ROS or third parties (such as suppliers, customers, governmental bodies, or courts) where the legitimate interest could be in particular (but not only):
 - o conduct of the general business of ROS, including the provision of services to customers),
 - o right to freedom of expression or information, including in the media and the arts,
 - o prevention of fraud, misuse of ROS IT systems, and
 - o physical security, IT and network security.

ROS shall not process sensitive personal data.

Sharing your personal data with third parties

Tech businesses such as ROS use third parties to help them host ROS environments, communicate with customers, etc. ROS partners with third parties who ROS believes are the best in their field at what they do. ROS does not share (nor need to share) personal data with them in order to get services to work well.

ROS does not share any personal data with any third parties for marketing purposes.

Staff members from ROS who provide services and have access to your personal data have all signed contracts and non-disclosure agreements.

Where and how long does store your personal data

ROS processes and store personal data on servers in the Netherlands, and in any case in the European Economic Area. If personal data are processed outside of the European Economic Area, this will not happen before appropriate arrangements are put in place, such as the conclusion of standard contractual clauses.

ROS will retain your personal data for the period determined in accordance with the ROS personal data retention policy

We do need take into account various legal and regulatory requirements for keeping your personal data. Key requirements driving the need for collection, analysis and storage of personal data include for example:

- Contractual obligations to carry out the requested services;
- Legal and tax compliance;
- Financial reporting.

As a cyber security consulting firm ROS collects a lot of other sensitive information due to the nature of its work. ROS takes the protection and retention of information other than personal data collected during projects very seriously. ROS shall archive information related to the project offline one year after the end of the project. ROS shall delete the information permanently, unless other legal obligations or specific requests from you would prevent that, three years after the end of a project.

Information and personal data security

As a cyber security company ROS takes security very seriously. ROS has physical, electronic, and management procedures to safeguard and secure the information ROS collects.

ROS' pentesters regularly check and help improve the security of ROS' own systems.

We would like to ask you to take the following into account when interacting with us:

- Even though ROS does use options of encryption and password protection on sensitive files; unfortunately no information transmission is guaranteed to be 100% secure; and
- Please keep your login credentials to ROS' internal chat environments secret and safe, this is your own responsibility.

If you believe your account, or the security of your personal data, has been breached, please inform ROS immediately at

support@radicallyopensecurity.com, and please inform your contact person at ROS immediately as well.

The rights of data subjects

(i) ***Right of access:*** You may have the right to obtain from ROS confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to that personal data. The access to information may include, by way of example, the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients to whom the personal data have been or shall be disclosed, the sources of the personal data, the duration of retention, and the technical security measures put in place to safeguard the personal data in case of transfer to a third country outside of the country or region where it was collected. However, this is not an absolute right and the interests of other individuals may restrict the right of access.

Notwithstanding the previous paragraph, you may have the right to obtain a copy of the personal data undergoing processing. However, the right to receipt of a copy is not an absolute right and the interests of other individuals may restrict the right of you to a copy. You may have the right to obtain one copy of the personal data undergoing processing. For further copies and/or requests of access, ROS may charge a reasonable fee based on administrative costs.

(ii) ***Right to correction or rectification:*** You may have the right to obtain from ROS the rectification or correction of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

It is your responsibility to provide ROS with accurate personal data about yourself and to inform ROS of any changes (e.g., change of name or address).

(iii) ***Right to erasure (right to be forgotten):*** You may, under certain circumstances, have the right to obtain from ROS the erasure of personal data concerning you in which case ROS may be obliged to erase, or render permanently unintelligible, such personal data.

(iv) ***Right to restriction of processing:*** Under certain circumstances, you may have the right to obtain from ROS restriction of processing personal data concerning you. In this case, the respective personal data shall be marked and may only be processed by ROS for certain purposes. However, as ROS processes and uses personal data primarily for purposes of carrying out the contractual or employment

relationship with you, ROS shall in principle have a legitimate interest for the processing which shall override the restriction request.

(v) **Right to personal data portability:** Under certain circumstances, you may have the right to receive the personal data concerning you, which you provided to ROS, in a structured, commonly used and machine-readable format and you may have the right to transmit this personal data to another entity without hindrance from ROS.

(vi) **Right to object:** Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by ROS and ROS can be required to no longer process such personal data concerning you. This is not an absolute right and does not apply in certain situations, such as when processing is necessary to perform the contract with you, to comply with applicable law, or to defend legal claims.

4. You have the right to file a complaint regarding ROS' processing your personal data

ROS would kindly ask you to please tell ROS first, so ROS has a chance to address your concerns. If ROS fails in this, you can address any complaint to the National Supervisory Authority (The Autoriteit Persoonsgegevens in the Netherlands).

To exercise any of the rights described above, you should contact ROS by email through support@radicallyopensecurity.com. ROS may require that you provide additional information to verify your identity, before responding to an inquiry regarding the processing of personal data.

ROS may have to deny your request if ROS is unable to verify your identity.

Final remarks

If you have questions, suggestions for improvements or other remarks, ROS would love to hear from you to further improve this policy. You can contact ROS by sending an email to support@radicallyopensecurity.com. As ROS continue to develop its personal data protection, changes to this policy shall be posted on this page.